

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i>	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

March 30, 2017

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees, along with counsel for the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina (SHC), write to request a brief extension of the deadline for submitting letters pursuant to Your Honor's March 24, 2017 Scheduling Order concerning the *Ashton* plaintiffs' separate complaint. The Court's Order currently requires that the *Ashton* plaintiffs and Kingdom of Saudi Arabia file separate letters detailing their positions by no later than Friday, March 31, 2017. For the reasons discussed below, the parties respectfully request that the deadline for those letters be extended to Wednesday, April 5, 2017. The Plaintiffs' Executive Committees also respectfully request a corresponding extension of the deadline for submitting their letter concerning the most efficient procedures for new cases to adopt the Consolidated Amended Complaint, also to April 5, 2017, as there are a few different approaches under discussion.

As directed by the Court's March 24, 2017 Order, the parties conferred by telephone on March 29, 2017 to discuss their respective views of the *Ashton* plaintiffs' separate complaint, and possible proposals relating to same. Because the proposals under discussion might implicate the scheduling and approach for briefing on the Kingdom's motion to dismiss the Consolidated Amended Complaint, the undersigned was asked to participate as well, on behalf of the Plaintiffs' Executive Committee signatories to the Consolidated Amended Complaint.

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The discussions during the call will require that all participating counsel confer further with their clients and relative constituencies. To allow necessary time for those conversations, the parties respectfully request that the deadline for submitting letters relating to the *Ashton* plaintiffs' separate complaint be extended to April 5, 2017. The Plaintiffs' Executive Committees also respectfully request a corresponding extension of the deadline for submitting their letter concerning the most efficient procedures for new cases to adopt the Consolidated Amended Complaint, to April 5, 2017.

The parties thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR



By: Sean P. Carter

SPC/:bdw

cc: The Honorable George B. Daniels (via ECF and Federal Express)  
All MDL Counsel of Record (via ECF)

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